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By ECF

November 19, 2024

The Honorable Richard M. Gergel
United States District Court
for the District of South Carolina
P.O. Box 835
Charleston, South Carolina 29402

Re: *Tyco Fire Products LP v. AIU Ins. Co., et al.*, Civ. No. 2:23-cv-2384 (D.S.C.)

Dear Judge Gergel:

Further to the Court's Scheduling Order dated October 30, 2023 (ECF 111), we write jointly on behalf of (1) Tyco Fire Products LP ("Tyco") and (2) Liberty Surplus Insurance Corporation, Hamilton Insurance Designated Activity Company, and Ohio Casualty Insurance Company (collectively, "Liberty") to inform the Court that Tyco and Liberty have reached a settlement-in-principle. This settlement-in-principle must be finalized through a formal written agreement, which Tyco and Liberty expect to finalize expeditiously.

In the event that Tyco and Liberty are unable to finalize their written settlement agreement, they will jointly and promptly report to the Court with a further update and proposed course of action.

Respectfully submitted,

WILLS MASSALON & ALLEN LLC

s/Christy Ford Allen

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-and-

s/Allan B. Moore

Allan B. Moore (*pro hac vice*)
Covington & Burling LLP

cc: All Counsel of Record (by ECF)